

**ICC Staff Confidentiality Procedures for Handling
NFF Contract Summaries**

The contract summaries are highly confidential, proprietary and commercially sensitive.

1. Access to the contract summaries shall be limited to only those staff with a need to know (e.g. staff assigned to audit the contracts).
2. The Director of the Financial Analysis Division, or his designee, shall maintain a log of all individuals given access, to or provided with, a copy of the contract summaries.
3. Staff shall keep the contract summaries (hard copies, disks, or CDs) in sealed envelopes conspicuously marked highly confidential and under lock and key when not being used. The contract summaries (whether in hard copy or electronic format) shall not be left out or unattended at any time.
4. Electronic copies of the contract summaries shall not be stored on the network or on computer hard drives.
5. Hard copies of the contract summaries shall not be transmitted via fax. Electronic copies of the contract summaries shall not be transmitted via e-mail. Contract summaries shall only be transmitted in a sealed envelope that is marked highly confidential via inter-office mail or hand delivered.
6. Staff performing audits of the contract summaries shall not make any additional copies of the contract summaries. Once the audits have been completed, all contract summaries and any workpapers, notes or other documents prepared during the course of the audit shall be returned to the Director of the Financial Analysis Division or his designee. Staff shall not retain copies of any of these documents in their personal files.
7. The contract summaries, and all related workpapers, notes or other documents prepared by Staff shall be kept under lock and key until such time as they are destroyed.
8. The Manager of Accounting shall ensure that all Staff members assigned to audit the contract summaries are familiar with these procedures.